

## **EXHIBIT 2**

1  
2 Tina Wolfson (SBN 174806)  
3 Robert Ahdoot (SBN 172098)  
4 Theodore W. Maya (SBN 223242)  
5 Rachel R. Johnson (SBN 331351)  
6 **AHDOOT & WOLFSON, PC**  
7 2600 West Olive Avenue, Suite 500  
8 Tel: (310) 474-9111  
9 Fax: (310) 474-8585  
10 twolfson@ahdootwolfson.com  
11 rahdoot@ahdootwolfson.com  
12 tmaya@ahdootwolfson.com  
13 rjohnson@ahdootwolfson.com

14 *Attorneys for Plaintiffs*

15 SONAL N. MEHTA (SBN 222086)  
16 Sonal.Mehta@wilmerhale.com  
17 WILMER CUTLER PICKERING  
18 HALE AND DORR LLP  
19 2600 El Camino Real, Suite 400  
20 Palo Alto, California 94306  
21 Telephone: (650) 858-6000  
22 Facsimile: (650) 858-6100

23 DAVID Z. GRINGER (*pro hac vice pending*)  
24 David.Gringer@wilmerhale.com  
25 WILMER CUTLER PICKERING  
26 HALE AND DORR LLP  
27 1875 Pennsylvania Avenue, NW  
28 Washington, DC 20006  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363

1 *Attorneys for Defendant*

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**UNITED STATES DISTRICT COURT**  
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**NORTHERN DISTRICT OF CALIFORNIA**  
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**SAN JOSE DIVISION**

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16 VICKIE SHERMAN, LEZAH NEVILLE-MARRS,  
17 KATHERINE LOOPERS, and JARRED JOHNSON,  
individually and on behalf of all others similarly  
situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC., a Delaware corporation  
21 headquartered in California,

22 Defendant.

23 Case No. 3:20-cv-08721-LB

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**STIPULATION AND ORDER TO  
STAY**

Hon. Laurel Beeler

1        WHEREAS, six putative class action lawsuits<sup>1</sup> have been filed against defendant  
 2 Facebook, Inc. in this District in recent weeks alleging violations of Section 2 of Sherman Act,  
 3 15 U.S.C. § 2;

4        WHEREAS, four of these lawsuits, including this case, are currently the subject of  
 5 contested motions pending before Judge Freeman to consider whether the cases should be related  
 6 to *Reveal Chat Holdco, LLC v. Facebook, Inc.*, No. 5:20-cv-00363-BLF;

7        WHEREAS, regardless of the outcome of Facebook's pending motion to relate the six  
 8 putative class action lawsuits that have been filed against Facebook to *Reveal Chat*, those six  
 9 cases themselves are likely to be the subject of motions to relate to one another;

10      WHEREAS, should Judge Freeman grant the pending motions to relate the cases, the  
 11 court will need to determine the manner in which these cases will proceed;

12      WHEREAS, regardless of whether Judge Freeman grants the pending motions to relate  
 13 the cases, one or more courts in this District may need to decide issues around interim class  
 14 counsel and/or whether to consolidate the cases;

15      WHEREAS, moving forward with responsive pleadings and other matters in this case  
 16 may impose an unnecessary burden on the Court and parties until the threshold issues of case  
 17 administration are resolved;

18      ACCORDINGLY, pursuant to Civil Local Rules 6-1 and 7-12, defendant Facebook, Inc.  
 19 and plaintiffs Vickie Sherman, Lezah Neville-Marrs, Katherine Loopers, and Jarred Johnson, by  
 20 and through their respective counsel, hereby stipulate and agree that good cause exists to stay  
 21 Facebook's time to answer or otherwise respond to the Complaint until further order of the  
 22 Court, and until such time as the Court convenes a status conference and issues any necessary  
 23 orders on how this case shall proceed.

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 25      <sup>1</sup> In addition to this case, the lawsuits are: *Klein v. Facebook, Inc.*, No. 5:20-cv-08570-LHK;  
 26 *Kupcho v. Facebook, Inc.*, No. 4:20-cv-08815-JSW; *Dames v. Facebook, Inc.*, No. 3:20-cv-  
 27 08817-TSH; *Steinberg v. Facebook, Inc.*, No. 3:20-cv-09130-SK; and *Affilious, Inc. v. Facebook,*  
 28 *Inc.*, No. 4:20-cv-09217-KAW.

1  
2 Dated: December 22, 2020

WILMER CUTLER PICKERING HALE  
AND DORR LLP

3 By: /s/ Sonal N. Mehta

4 SONAL N. MEHTA

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6 *Attorney for Defendant*  
7 Facebook, Inc.

8 Dated: December 22, 2020

AHDOOT & WOLFSON PC

9 By: /s/ Tina Wolfson

10 Tina Wolfson

11  
12 *Attorney for Plaintiffs*  
13 Vickie Sherman, Lezah Neville-Marrs,  
14 Katherine Loopers, and Jarred Johnson

## **SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: December 22, 2020

By: /s/ Sonal N. Mehta  
Sonal N. Mehta

## **ORDER**

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED: Facebook's time to answer or otherwise respond to the Complaint is STAYED pending further order of the Court. At the appropriate time the Court SHALL convene a status conference and issue any necessary orders on how this case shall proceed.

DATED: December 23, 2020

By:

Hon. Laurel Beeler

## United States Magistrate Judge

Submitted by:

WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ Sonal N. Mehta

*Attorney for Facebook, Inc.*